

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re

KPFA, INC.,

Debtor.

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Case No.:

06- 10177-SMB

**In Proceedings for
Reorganization under
Chapter 11**

**DEBTOR’S MOTION FOR AN ORDER FIXING THE LAST DATE
TO FILE PROOFS OF CLAIM**

**TO: THE HON STUART M BERNSTEIN
UNITED STATES BANKRUPTCY CHIEF JUDGE**

KPFA, Inc., the Debtor in Possession (“KPFA” or the “Debtor”), by its
attorneys Dahiya & Associates, represents:

PRELIMINARY STATEMENT

1. The Debtor requests that this Court issue the annexed order: dated April 7, 2006, setting June 15, 2006 as the last day for filing proofs of claim in this case (the “Bar Date”) and approving notice of the Bar Date; and b.) granting such other and further relief as this Court deems proper (the “Motion).
2. The Motion should be granted because:
 - a.) The Debtor is looking to progress its case;
 - b.) Setting a Bar Date will enable the Debtor to fix its universe of claims for preparing its prospective plan of reorganization in this case and its related disclosure statement.

These matters are elucidated herein:

BACKGROUND

- I. The Debtor filed its Chapter 11 petition on January 31, 2006
- II. The Debtor has been continued in the possession of its property and operation of its business as a debtor in possession, pursuant to 11 U.S.C. §§ 1108 and 1109.
- III. The Debtor is a For-profit New York State corporation operating a health store. Primarily it is in the business of selling health related products and as well catering to individual and corporate clients.
- IV. There is no Committee of Unsecured Creditors appointed in this case.
- V. No Chapter 11 trustee has been appointed.
- VI. This Court has jurisdiction over this matter, pursuant to 28 U.S.C. §§ 1334 and 157

- VII. This matter is a "core proceeding" as that term is defined by 28 U.S.C. § 157.
- VIII. This district is the appropriate district to consider this Motion, pursuant to 28 U.S.C. § 1408.

A BAR DATE SHOULD BE SET

- IX. The Debtor is looking to progress its case.
- X. Setting a Bar Date will enable the Debtor to fix its universe of claims for preparing its proposed plan of reorganization in this case and its related disclosure statement.
- XI. The Debtor has mailed to the Office of the United States Trustee a copy of this motion and proposed order seeking June 15, 2006 as a Bar Date.
- XII. The date for government units to file proofs of claim should be the 180 days after the filing of this case which is August 15, 2006.
- XIII. A copy of the proposed notice of the Bar Date is annexed hereto as Exhibit "A."
- XIV. The timing of the proposed Bar Date is within the time parameters of Fed.R.Bankr.P. 2002.
- XV. The Debtor requests that the requirement of a separate memorandum of law, pursuant to the Local Rules of this Court, be waived because the nature of the relief sought is not controversial and the applicable authority is discussed herein.
- XVI. No prior application for the relief sought herein has been made to this or any other Court.

WHEREFORE the Debtor requests that this Court grant this Motion and enter orders: a.) setting June 15, 2006 as the last day for filing proofs of claim in this case; and approving notice of the Bar Date; and b.) granting such other and further relief as this Court deems proper.

Dated: Jackson Heights, New York

April 7, 2006

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By: /s/ Karamvir Dahiya.
KARAMVIR DAHIYA (KD 9738)